REMARKS/ARGUMENTS

Favorable reconsideration of this application as presently amended and in light of the following discussion is respectfully requested.

Claims 1, 3, 11, 18, 20, 22, and 40-43 are presently active. Claims 2, 4-10, 12-17, 19, 21, and 23-39 are withdrawn. Claims 1 and 18 have been presently amended. Claims 40-43 have been added. No new matter was added as support for the presently added features is shown in Applicant's Figures 1-3, 7, and 7D.

In the outstanding Office Action, Claims 1, 3, and 11 were rejected under 35 U.S.C. § 112, second paragraph, as being indefinite. Claims 1, 3, and 11 were rejected under 35 U.S.C. § 102(a) as being anticipated by U.S. Patent No. 7,227,097 to Kumar et al. Claims 18, 20, and 22 were rejected under 35 U.S.C. 103(a) as being unpatentable over Kumar et al in view of U.S. Patent No. 6,071,573 to Koemtzopoulos et al.

Regarding the 35 U.S.C. § 112, second paragraph, rejection, Claim 1 has been amended to positive set forth from the preamble that it is the processing element whose components are being recited. Thus, it is respectfully submitted that the 35 U.S.C. § 112, second paragraph, rejection has been overcome.

Regarding the art rejections, the passive plasma catalyst in liners in Kumar et al are described therein as being nano-particle, nano-tubes, or powders. See Figure 2 and col. 9 of Kumar et al. The passive plasma catalyst in liners in Kumar et al are also described therein as being in the form of a sheet. See Figure 6 and col. 10 of Kumar et al.

Claims 1 and 18 have been amended to define a passive polymeric component disposed on a substrate holder and surrounding a substrate position in the semiconductor manufacturing system, as shown in Applicant's Figures 1-3 and 7.

There is no substrate described or shown in Kumar et al. While Koemtzopoulos et al shows a substrate 23 and a substrate stage 24, there is no description in Koemtzopoulos et al of any component on the substrate stage surrounding the substrate. Thus, both Kumar et al and Koemtzopoulos et al fail to disclose or suggest the claimed feature of a passive polymeric component disposed on a substrate holder and surrounding a substrate position in the semiconductor manufacturing system.

M.P.E.P. § 2131 requires for anticipation that each and every feature of the claimed invention must be shown in as complete detail as is contained in the claim. M.P.E.P. § 2143.03 requires, to establish a case of *prima facie* obviousness, all the claim limitations must be taught or suggested by the prior art. Hence, with the above noted feature being absent from that applied references, independent Claims 1 and 18 define patentable subject matter.

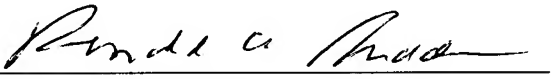
Furthermore, there is no rationale to modify Koemtzopoulos et al to accommodate the claimed passive polymeric component disposed around a substrate in the semiconductor manufacturing system. Indeed, adding such a structure around the substrate in Koemtzopoulos et al would likely produce edges where the pre-coat in Koemtzopoulos et al would likely generate particles. The problem of particle generation is described in Koemtzopoulos et al at col. 5, line 65, to col. 6, line 8.

Thus, it is respectfully submitted that independent Claims 1 and 18 (and the claims dependent therefrom) patentably define over the applied references Accordingly, it is requested that Claims 2, 4-10, 12-17, 19, 21, and 23-26 (which depend from either Claim 1 or Claim 18) be rejoined and passed to issuance.

Consequently, in view of the present amendment and in light of the above discussions, the outstanding grounds for rejection are believed to have been overcome. The application as amended herewith is believed to be in condition for formal allowance. An early and favorable action to that effect is respectfully requested.

Respectfully submitted,

OBLON, SPIVAK, McCLELLAND,
MAIER & NEUSTADT, P.C.



Steven P. Weihrouch
Attorney of Record
Registration No. 32,829

Ronald A. Rudder, Ph.D.
Registration No. 45,618

Customer Number
22850

Tel: (703) 413-3000
Fax: (703) 413 -2220
(OSMMN 06/04)

I:\ATTY\RAR\AMENDMENTS (2006)\240720US\RESPONSETOOA09092007.DOCC